

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

STATE OF WASHINGTON, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official
capacity as President of the United States of
America, et al.,

Defendants.

NO.

DECLARATION OF
HEIDI ULLOM

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ATTORNEY GENERAL OF WASHINGTON
Complex Litigation Division
800 Fifth Avenue, Suite 2000
Seattle, WA 98104
(206) 464-7744

1 I, Heidi Ullom, declare as follows:

2 1. I am over the age of 18, competent to testify as to the matters herein, and make
3 this declaration based on my personal knowledge.

4 2. I live in Sammamish, Washington.

5 3. I work as a Registered Nurse in Cancer and Blood Disorders at Seattle Children's
6 Hospital.

7 4. I have two children, a 19-year-old daughter, and a 16-year-old transgender
8 daughter. I have chosen to refer to her as "my youngest child" or "my youngest daughter"
9 because I am fearful for her and her safety and privacy, given the federal government's all out
10 assault on transgender people, which normalizes and encourages anti-trans language,
11 harassment, and discrimination.

12 5. My youngest child is exceptionally intelligent, kind, considerate, sensitive, and
13 empathetic. When she was younger and played soccer and basketball, she was the only person
14 on the team who would cry when losing a game. She is a reader, especially of manga and enjoys
15 studying history; she is a homebody, mostly. She loves videogaming and has developed a group
16 of friends online and engages in online raids with them. She is interested in computer science
17 and is teaching herself how to code and design video games. She is teaching herself Japanese
18 and after three years of studying Spanish, she is amazing at speaking the language. She is a
19 Running Start student at a school of higher education in Washington. She is 16 going on 60
20 mentally, an old soul. She does not use social media. She makes decisions with thought and care.
21 That is why she has not yet changed her "boy" name from the one we gave her at birth. She
22 wants to be sure that is what she wants. She cares for people and animals. She is the best parts
23 of me and my husband.

24 6. No one would have known that my youngest child was transgender before the age
25 of 13. Until then, she presented as a boy. But when puberty hit, she became very uncomfortable
26 in and with her body. She avoided looking in the mirror, getting haircuts, and being

1 photographed. She began restricting her calorie intake, so as not to put on masculine weight. She
2 lost weight and although very introverted, she became even more closed off. She was very
3 anxious and depressed about her body changing, especially hair growth on her face. We gave
4 her a razor and showed her how to use it. Group settings especially exacerbated her anxiety and
5 depression. She was worried about drawing attention to herself and did not want people's focus
6 on her.

7 7. When my youngest daughter was 14 years old, after having done two years of
8 research and thinking about her gender on her own, she told me and my husband that she
9 identified as a transgender girl and wanted to use she/her pronouns. At the time, we didn't know
10 any other trans people, and we tried to embrace her and support her as best we could. Once she
11 came out and realized she had a family who would listen, support and advocate for her, she
12 became a different person. She was more open and willing to talk about how she sees the world,
13 less depressed and more at ease.

14 8. At the time my daughter came out as trans, I just happened to be working on a
15 Fertility Preservation team at a Seattle hospital, and in that work I became aware of the gender
16 clinic there. It was a six-month wait, and we used that time to research and consider options for
17 helping my youngest daughter be seen in public as her true self, including puberty blockers and
18 hormone therapy.

19 9. After researching her options and in-depth discussions with her father and me,
20 my youngest daughter went into the Gender Clinic knowing that she wanted to be on a puberty
21 blocker and hormone therapy, but not surgery. In fact, she felt that she had waited too long and
22 progressed too far into puberty. The Gender Clinic doctors carefully walked us through the
23 gender-affirming options available to my youngest daughter. What she learned from the doctors
24 only confirmed her resolve for a puberty blocker and hormone therapy. My youngest daughter
25 was adamant that she did not want to look like the men in her family: tall men, some 6'7" with
26 big beards. She was afraid of gaining weight in a masculine way. Puberty blockers and hormone

1 therapy would help her feminize her physical features. She underwent blood tests to check her
2 testosterone levels, and her doctor was able to confirm that her puberty was not complete, at
3 which point a puberty blocker was recommended. She then started taking estrogen a few months
4 before her 16th birthday.

5 10. When she started therapy at Seattle Children's, she truly came out of her shell,
6 began eating and exercising, seeing positive changes in her body, showing more confidence, and
7 she is happy. My daughter is thriving and living her life like any other young teenage girl.

8 11. She will celebrate her 17th birthday in April, and she has never been happier.
9 Since receiving gender-affirming medical care, my youngest daughter is not anxious or
10 depressed about the way her body looks or that it will betray her in public. She has a sense of
11 self-worth and confidence that she did not have before. She knows she matters. I cannot ask for
12 more as a parent.

13 12. We've discussed her future plans at length with her medical providers. We've
14 talked about when she'll transition to adult care, and what it will look like when she goes off to
15 college.

16 13. I ask my youngest daughter if she would ever consider de-transitioning, and it's
17 never a thought in her mind. It's never been a consideration, for even a second. Like many
18 women in the Pacific Northwest, she doesn't wear dresses or makeup, but she is a young woman.

19 14. I trust my daughter. I trust that she knows her body. I do not think that any person
20 who is not trans could ever understand what they're going through. I think that trans people know
21 themselves. Even if they do not and are unsure, they are on a journey. They are on their journey,
22 not anyone else's, and they should be free to continue on it. I believe that individuals that are
23 deeply uncomfortable in the bodies they are born into will pursue any relief from that discomfort,
24 even if that ends with them ending their life in that body. I cannot let that be my daughter's
25 future.
26

1 15. This Executive Order that targets gender-affirming care did not come as much of
2 a surprise to my youngest daughter. She kept very close eyes on the election and was
3 disappointed in the outcome because she knew that it would have grave consequences for her
4 and people like her. We will do whatever it takes to get her what she needs. As a nurse, I must
5 abide by nursing ethics, but I want my child to get the care that she needs. We are considering
6 all options as a means to that end, even relocation to Canada. We do not want to move because
7 we have a community here. Our life is here, but I do not want to go back in time and see her how
8 she was before she received gender-affirming care. I do not understand how the president and
9 his administration can believe that they know what is best for the health and well-being of my
10 youngest daughter better than my husband, me, the doctors, and my daughter.

11 16. The Executive Order ignores substantial evidence-based research and studies
12 published in peer-reviewed medical and scientific journals showing that access to gender-
13 affirming care decreases anxiety, depression, self-harm and suicidal ideation in transgender
14 children, adolescents and young adults. Not one study on gender care shows that gender-
15 affirming care is detrimental to mental health.

16 17. Having been a nurse working with kids, adolescents, and young adults with
17 cancer, I know that no medical treatment is without side effects. Hormones and puberty blockers
18 can cause problems with bone density and infertility. Gender-affirming care is potentially
19 lifesaving for transgender and nonbinary youth. I would rather have a child who is alive and
20 happy with bone density issues and infertility than the alternative.

21 18. I hate to think about going back two years to a daughter who felt alone, anxious,
22 depressed, prone to self-harm and unhappy in her body but the Trump Administration is
23 determined to make this so for my child and other transgender kids like her. By ordering that
24 there are only two genders, using anti-transgender language and enacting policies that take away
25 rights to bodily autonomy of United States citizens, they are seeking not only to stigmatize,
26 “other” and dehumanize LGBTQIA+ people, they are trying to erase them.

1 I declare under penalty of perjury under the laws of the State of Washington and the
2 United States of America that the foregoing is true and correct.

3 DATED this ____ day of February 2025 at _____, Washington.
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HEIDI ULLOM
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1 I declare under penalty of perjury under the laws of the State of Washington and the
2 United States of America that the foregoing is true and correct.

3 DATED this 4th day of February 2025 at SEATTLE, Washington.

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5 HEIDI ULLOM